BEFORE THE POSTAL RATE COMMISSION

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POSTAL RATE COMMILLATION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

NOTICE BY UNITED PARCEL SERVICE OF INTENT TO CONDUCT ORAL CROSS-EXAMINATION OF UNITED STATES POSTAL SERVICE WITNESS PAFFORD (USPS-T-4) (April 6, 2000)

Pursuant to Section 30(e)(3) of the Commission's Rules of Practice, United Parcel Service ("UPS") hereby gives notice that it intends to conduct oral cross-examination of United States Postal Service witness Pafford on the following subjects: the relationship between the DRPW and BRPW systems in estimating Parcel Post revenue, pieces, and weight (USPS-T-4 at 3-4); the development of DRPW estimates for Parcel Post (USPS-T-4 at 4-6); the use of the DRPW system to develop estimates of inter-BMC, intra-BMC, and DBMC revenue, pieces, and weight (USPS-T-4 at 4-6); the decision to not use the DRPW system to develop estimates of revenue, pieces, and weight for all of Parcel Post (USPS-T-4 at 3-4); steps taken to insure that information for pieces sampled by the DRPW system are not also counted in the BRPW system (USPS-T-4 at 3-4); how DRPW data is collected (USPS-T-4 at 4-6); the Postal Service's procedures for verifying the accuracy of DRPW data (USPS-T-4 at 4-7); how the Postal Service processes and checks DRPW data both before, as, and after it is used in the DRPW estimation process (USPS-T-4 at 4-7); the treatment of data anomalies (USPS-

T-4 at 4-7); revenue adjustments and conversions from PFY to GFY estimates (USPS-

T-4 at 6-7); and clarification of and expansion on Mr. Pafford's interrogatory responses.

Respectfully submitted,

John E. McKeever William J. Pinamont Phillip E. Wilson, Jr.

Attorneys for United Parcel Service

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Of Counsel.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Commission's Rules of Practice.

Phillip E. Wilson, Jr.

Attorney for United Parcel Service

Dated: April 6, 2000 Philadelphia, Pa.

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